

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

OPTINETIX (ISRAEL) LTD.,

Plaintiff,

v.

MICHAELS STORES, INC.,

Defendant.

C.A. No. 9:22-cv-00189-MJT

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES

Plaintiff Optinetix (Israel) Ltd. (“Plaintiff” or “Optinetix”) and Defendant Michaels Stores, Inc. (“Defendant” or “Michaels”) by and through counsel and subject to the approval of this Court, hereby file this Joint Motion to Stay All Deadlines, and in support thereof, respectfully show the Court as follows:

1. The parties are currently engaged in settlement negotiations in this matter.
2. The parties believe that in addition to reducing burden on the Court, a stay will help facilitate early resolution by minimizing costs.
3. Accordingly, the parties respectfully request that the Court grant a stay of the proceedings between the parties, including all deadlines, of thirty (30) days pending finalization of a settlement agreement.
4. Good cause exists for granting this Joint Motion, as set forth above.
5. The motion is not filed for purposes of delay but so that justice may be served.

WHEREFORE, the parties respectfully request that this Court grant a stay of all deadlines of thirty (30) days pending finalization of a settlement agreement.

Dated: March 10, 2023

Respectfully submitted,

/s/ Victor C. Johnson

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/s/ Kirk J. Anderson

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Ltd.*